

JOSEPH A. LIEBMAN
Nevada Bar No. 10125
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
jliebman@baileykennedy.com

MICHAEL M. LATER
Nevada Bar No. 7416
THE LAW OFFICE OF MICHAEL M. LATER
8890 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.685.4400
Facsimile: 702.629.7783
michael@mlaterlaw.com

Attorneys for Defendants
Philippe Ziade, Jude Nassar, Appleton
Properties, LLC, Z Leb Group, LLC,
Progressive Construction, Inc., Growth
Development, LLC, Vibrant Realty, LLC,
AJ Properties International, LLC, AJ Properties
International Series 2, LLC, Growth Holdings,
LLC, Growth Luxury Homes, LLC, and
Growth Luxury Realty, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Nikkei Global Inc., a California corporation,

Plaintiff,

vs.

Co-Partner Consortium ("Partner-CO"), a
Nevada general partnership associated in fact
and as an enterprise per 18 USCA § 1961(3);
Mr. Phillip Ziade, Nevada resident and co-
partner; Mr. Jude E. Nassar, an individual
resident of Clark County, Nevada; Appleton
Properties, LLC, a Nevada limited liability
company; Z Leb Group, LLC, a Nevada limited
liability company; Progressive Construction,
Inc. a/k/a Growth Construction, a Nevada
corporation; Growth Development, LLC a/k/a
Growth Construction, a Nevada limited liability
company, Vibrant Realty, LLC, a Nevada
limited liability company; AJ Properties
International, LLC, a/k/a AJ1, a Nevada limited
liability company; AJ Properties International
Series 2 LLC, a/k/a AJ2, a Nevada limited

Case No. 2:18-cv-02013-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS PHILIPPE ZIADE, JUDE
NASSAR, APPLETON PROPERTIES,
LLC, Z LEB GROUP, LLC,
PROGRESSIVE CONSTRUCTION, INC.,
GROWTH DEVELOPMENT, LLC,
VIBRANT REALTY, LLC, AJ
PROPERTIES INTERNATIONAL, LLC,
AJ PROPERTIES INTERNATIONAL
SERIES 2, LLC, GROWTH HOLDINGS,
LLC, GROWTH LUXURY HOMES, LLC,
AND GROWTH LUXURY REALTY,
LLC'S TO FILE REPLY IN SUPPORT
OF THEIR MOTION TO DISMISS
FIRST AMENDED COMPLAINT [ECF
NO. 44]**

(Second Request)

liability company; Growth Holdings, a Nevada corporation; Growth Luxury Homes, LLC, a/k/a GLH, a Nevada limited liability company; Growth Luxury Realty, LLC, a/k/a GLR, a Nevada limited liability company; Mr. Yoshimi Hirooka, a resident of Japan or Singapore, doing business in Nevada; Mr. Yoshihiro Hirooka, a resident of Japan or Singapore doing business in Nevada; Hirooka Family Office, Ltd., a foreign organization doing business in Nevada,

Defendants.

Plaintiff Nikkei Global Inc. (“Nikkei”), and Defendants Philippe Ziade, Jude Nassar, Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes, LLC, and Growth Luxury Realty, LLC (collectively, “Growth”), by and through their respective counsel, stipulate and agree as follows:

1. On October 18, 2018, Nikkei filed its Complaint [ECF No. 1] (the “Complaint”);
2. On November 19, 2018, Growth accepted service of the Complaint.
3. On January 4, 2019, Growth filed their Motion to Dismiss [ECF No. 23] and served Nikkei with the same.
4. On January 25, 2019, Nikkei filed a First Amended Complaint [ECF 39], which is permitted one time as a matter of course. *See* Fed. R. Civ. P. 15(a)(1)(B).
5. Due to the filing of the First Amended Complaint, Growth and Nikkei previously agreed, and the Court ordered, a withdrawal of the pending Motion to Dismiss because it had been mooted, in part, by Nikkei’s filing of the First Amended Complaint [ECF 40].
6. On March 15, 2019, Growth filed their Motion to Dismiss First Amended Complaint and served Nikkei with the same [ECF 44].
7. Because of scheduling conflicts and other litigation commitments, Nikkei requested that its date for response to Growth’s Motion to Dismiss First Amended Complaint be extended from March 29, 2019 through and including April 19, 2019. Counsel for Growth agreed to this extension.
8. On April 19, 2019, Nikkei filed its Opposition to Growth’s Motion to Dismiss First

Amended Complaint (Oral Argument Requested) [ECF 47].

9. Because of an upcoming trial for counsel of Growth, they requested that any Reply in Support of the Motion to Dismiss First Amended Complaint be filed on or before May 15, 2019.

Counsel for Nikkei did not oppose this extension request, and the stipulation was granted [ECF 45].

10. Due to the scheduling issues and briefing deadlines in other matters, counsel for Growth has requested that the date for their Reply in Support of the Motion to Dismiss First Amended Complaint be extended from May 15, 2019 through and including May 20, 2019. Counsel for Nikkei has graciously agreed to this extension.

11. This is the second stipulation to extend the deadline to file a Reply in support of the Growth's Motion to Dismiss First Amended Complaint. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 13th day of May, 2019.

DATED this 13th day of May, 2019.

DREITZER LAW

BAILEY ♦ KENNEDY


By: /s/ Richard Dreitzer
RICHARD DREITZER
601 S. Tenth St., Suite 202C
Las Vegas, NV 89101

By: /s/ Joseph A. Liebman
JOSEPH A. LIEBMAN
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Attorneys for Plaintiff Nikkei Global Inc.

Attorneys for Growth

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

May 15, 2019
DATED: _____